

**Picker, Joshua B**

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**From:** Picker, Joshua B  
**Sent:** Thursday, June 07, 2018 2:11 PM  
**To:** Olds, Dara (USANYE)  
**Cc:** Hugh Handeyside; Cecillia Wang; Roman, Neil  
**Subject:** Amadei v. Nielsen

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dara,

The document production made on behalf of the ICE defendants on May 11 in the *Amadei* matter is inadequate. Not only is it only 28 pages (consisting solely of organizational data and three short memoranda), but it does not include documents that we would expect such as documentation of ICE policies and practices, documents referenced in the memos that were produced, materials that were provided in response to prior FOIA requests, or even a single email from any ICE custodian.

Moreover, since your production of May 11, we have received no further productions from ICE and have yet to receive documents from CBP or DHS even though we served our document requests on February 5 and the Court's May 1 scheduling order directed Defendants to begin rolling document production by the following week. Furthermore, you have not provided us with the information you promised regarding who you define as the "key CBP management officials" whose documents you plan to search in response to Plaintiffs' First RFP No. 16.

Please provide the information regarding these CBP officials, and advise as to when you expect to produce CBP and DHS documents and additional ICE documents, the approximate volume of those productions, and the reasons for the production delay.

Best,  
Josh

**Joshua B. Picker**

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